

DOCKETED	
Docket Number:	21-AFC-02C
Project Title:	Willow Rock Energy Storage Center – Compliance
TN #:	271972
Document Title:	STAFF APPROVAL OF PROPOSED CHANGES OF VERIFICATIONS FOR CONDITIONS OF CERTIFICATION
Description:	STAFF APPROVAL OF PROPOSED CHANGES OF VERIFICATIONS FOR CONDITIONS OF CERTIFICATION (BIO-24, CUL/TRI-2, LAND-2, PAL-2, TRANS-1, WATER-1)
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Submitter Role:	Commission Staff
Submission Date:	8/12/2026 10:11:07 AM
Docketed Date:	8/12/2026

Proposed Verification Language Changes:

BIO-24 (Condition not included due to length and no submittal timing is specified in the Condition)

Verification: The project owner shall provide the updated Jurisdictional Report that clearly delineates all proposed permanent and temporary impacts, the proposed engineering drawings for each crossing type, and the hydrologic studies used to inform the engineering design to the CPM for review and approval no less than 45 days prior to construction site mobilization. The project owner shall provide Final Reports and Plans to the CPM and the CDFW no later than 14 days prior to the installation of any engineered crossing, bridge, or new culvert.

A separate update Jurisdictional Report shall be provided 45-days prior to construction of the gen-tie line.

Reason for change: The change from site mobilization to construction is to provide additional time to complete the necessary drawings. The second change is to acknowledge that the information for the gen-tie line will be submitted separately.

CUL-2/TRI-2

INFORMATION TO BE PROVIDED TO THE CRS

Prior to the start of ground disturbance, the project owner shall provide the CRS with copies of the application for certification (AFC), data responses, confidential cultural resources reports, all supplements, the cultural and tribal cultural resources section from the CEC's Final Staff Assessment (FSA), and the **Cultural and Tribal Cultural Resources** Conditions of Certification from the CEC's Final Decision for the project, if the CRS does not already possess copies of these materials. The project owner shall also provide the CRS and the CPM with maps and drawings showing the footprints of the power plant, all linear facility routes, all access roads, and all laydown areas. Maps shall include the appropriate United States Geological Survey quadrangles and a map at an appropriate scale (e.g., 1:24,000 and 1 inch = 200 feet, respectively) for plotting cultural features or materials. If the CRS requests enlargements or strip maps for linear facility routes, the project owner shall provide copies to the CRS and CPM. The CPM shall review map submittals and, in consultation with the CRS, approve those that are appropriate for use in cultural resources planning activities. No ground disturbance shall occur prior to CPM approval of maps and drawings unless such activities are specifically approved by the CPM. Maps shall include any cultural and tribal cultural resources, including any historic built environment resources, identified in the FSA's project area of analysis (PAA). If construction of the project would proceed in phases, maps and drawings not previously provided shall be provided to the CRS and CPM prior to the start of each phase. Written notice identifying the proposed schedule of each project phase shall be provided to the CRS and CPM.

Weekly, until ground disturbance is completed, the project construction manager shall provide to the CRS and CPM a schedule of project activities for the following week, including the identification of area(s) where ground disturbance will occur during that week.

The project owner shall notify the CRS and CPM of any changes to the scheduling of the construction phases.

The project owner shall provide the documents described in the first paragraph of this condition to the new CRS if the approved CRS is terminated or resigns.

Verification: At least 15 days prior to the start of Early Works grading, (or a project owner and CPM mutually agreed upon alternative time frame)~~ground disturbance~~, the project owner shall provide the CPM notice that the AFC, data responses, confidential cultural resources documents, all supplements, FSA, and Final CEC Decision have been provided to the CRS, if needed, and the subject maps and drawings to the CRS and CPM. The CPM will review submittals in consultation with the CRS and approve maps and drawings suitable for cultural resources planning activities.

At least ~~5~~15 days prior to the start of Early Works grading, (or a project owner and CPM mutually agreed upon alternative time frame)~~ground disturbance~~, if there are changes to any project-related footprint, the project owner shall provide revised maps and drawings for the changes to the CRS and CPM.

At least 15 days prior to the start of each phase of a phased project (or a project owner and CPM mutually agreed upon alternative time frame), the project owner shall submit the appropriate maps and drawings, if not previously provided, to the CRS and CPM.

Weekly, during ground disturbance, a schedule of the next week's anticipated project activity shall be provided to the CRS and CPM by letter, e-mail, or fax.

Note: The changes are to provide additional time to complete the necessary drawings and get the drawings to the CRS prior to when they are needed.

LAND-2

Prior to any grading or development for the permanent project facilities under CEC jurisdiction (including the Willow Rock Energy Storage Center, gen-tie line, and optional architectural berm) the project owner shall develop a construction site plan~~s~~ (including the temporary rock crushing facility and concrete batch plant) and operation site plan~~s~~ (including the optional architectural berm) and submit it to the Kern County Planning and Natural Resources Department for review and comment, and to the CPM for approval, to ensure compliance with local regulations, including conditions required by the ALUCP. The project owner shall adhere to CPM-approved

site plans during construction and operation and ensure that local regulations are complied with during construction and operation of the permanent project facilities.

Verification: At least 60 days prior to any grading or development for permanent project facilities under CEC jurisdiction (or a project owner and CPM mutually agreed upon alternative time frame) (including the Willow Rock site, gen-tie line, and a potential architectural berm), for each project phase (Early Works, Later Works, and the gen-tie line), the project owner shall submit proposed site plans for these facilities to the Kern County Planning and Natural Resources Department for review, comment, and approval, and to the CPM for review and approval. The project owner shall provide any review comments from Kern County to the CPM at least 30 days prior to any grading or development for these permanent project facilities- (or a project owner and CPM mutually agreed upon alternative time frame).

Separate construction site plans shall be submitted for Early Works, Later Works, and the gen-tie line prior to grading or development for the permanent project facilities for each phase.

Note: The changes acknowledge that separate plans will be submitted for the Early Works Area, Late Works Area, and gen-tie line.

PAL-2

The project owner shall provide the PRS and the CPM, for review and approval, maps and drawings showing the footprint of the power plant, construction laydown areas, and all related facilities. Maps shall identify all areas of the project where ground disturbance is anticipated. If the PRS requests enlargements or strip maps for linear facility routes, the project owner shall provide copies to the PRS and CPM. The site grading plan and the plan and profile drawings for the utility lines would be acceptable for this purpose. The plan drawings must show the location, depth, and extent of all ground disturbances and be at a scale between 1 inch = 40 feet (1:480) and 1 inch = 100 feet (1:1,200). If the footprint of the project or its linear facilities change, the project owner shall provide maps and drawings reflecting those changes to the PRS and CPM.

If construction of the project proceeds in phases, maps and drawings may be submitted prior to the start of each phase. A letter identifying the proposed schedule of each project phase shall be provided to the PRS and CPM. Before work commences on affected phases, the Project owner shall notify the PRS and CPM of any construction phase scheduling changes.

At a minimum, the project owner shall ensure that the PRS or PRM consults weekly with the project superintendent and construction field manager to confirm area(s) to be worked the following week, until ground disturbance is completed.

Verification: At least ~~15~~ 30 days prior to the start of Early Works grading, (or a project owner and CPM mutually agreed upon alternative time frame) ~~ground disturbance~~, the project owner shall provide maps and drawings to the PRS and CPM for review and approval.

If there are planned changes to the footprint of the project, revised maps and drawings shall be provided to the PRS and CPM at least ~~5~~ 15 days prior to the start of grading, (or a project owner and CPM mutually agreed upon alternative time frame) ~~ground disturbance~~.

Note: The changes are to provide additional time to complete the necessary drawings and get the drawings to the PRS prior to when they are needed.

TRANS-1

Prior to the start of construction, the project owner shall prepare Construction Traffic Management Plan (CTMP). The CTMP shall address the movement of workers, vehicles, equipment, and materials, including arrival and departure schedules, carpooling, a parking/staging plan, and designated workforce and delivery routes. Traffic control plans shall be prepared as necessary to address construction staging, as well as any roadway or lane closures and shall include any signage or roadway lighting improvements deemed necessary during construction. The CTMP shall address means of access for emergency vehicles to the project site, as well as means of maintaining access to any adjacent residential and commercial property during the construction and maintenance of the project.

The CTMP shall include procedures to restore damage to existing roadways caused by project construction traffic, including corresponding traffic index calculations. The construction contractor shall work with Kern County and Caltrans to prepare a schedule and mitigation plan for the roadways along construction routes, in accordance with the procedures established by the CTMP.

The CTMP shall include measures to ensure safe ingress and egress at the project access intersections. Measures may include removal of vegetation to provide unobstructed line of sight, addition of advanced warning signs, and active work zone traffic control/traffic management as approved by the CPM. The CTMP shall also be submitted to Kern County and Caltrans for review and comment.

Verification: At least 60 calendar days prior to the start of construction, for the project site and 60 calendar days prior to the start of construction for the gen-tie line, the project owner shall submit the each CTMP to

Kern County, Caltrans, and California Highway Patrol (CHP) for review and comment and to the CPM for review and approval. The project owner shall also provide the CPM with a copy of the transmittal letters to Kern County, Caltrans, and CHP requesting review and comment.

The CTMPs shall include transportation demand management (TDM) measures to reduce project-generated VMT during construction. The CTMP shall outline VMT reduction measures, which may include, by way of example, the following:

- Provide information regarding lodging for specialized workers about lodging options close to the site.
- Create or promote existing carpooling programs to encourage employees to carpool.
- Offer a shuttle service for employees with pick-up points at nearby hotels housing specialized workers or park-and-ride lots.

At least 30 calendar days prior to the start of construction for the project site and 30 calendar days prior to the start of construction for the gen-tie line, the project owner shall provide copies of any comment letters received from Kern County, Caltrans, CHP, or any other interested agencies, along with any changes to the CTMP, for CPM review and approval. After CPM review and approval, the project owner shall provide completed copies of the final CTMPs to Kern County, Caltrans, CHP, and any other interested agencies, sending copies of the correspondence to the CPM.

Note: The changes acknowledge that separate plans will be submitted for the Early Works Area and the gen-tie line.

WATER-1 (Condition not included due to length and no submittal timing is specified in the Condition)

Verification: No later than forty-five (45) ~~thirty (30)~~ days prior to start of the October 1, 2026 rainy season, (or a project owner and CPM mutually agreed upon alternative time frame) ~~site mobilization~~, the Project owner shall submit a copy of the final DESC to the CPM for review and to Kern County and the Lahontan RWQCB if required. The CPM shall consider comments if received by the county and RWQCB before approval of the DESC. The DESC shall be consistent with the grading and drainage plan as required by Condition of Certification **CIVIL-1**, and relevant portions of the DESC shall clearly show approval by the chief building official. The Project owner shall provide in the Monthly Compliance Report with a narrative on the effectiveness of the drainage, erosion, and sediment-control measures and the results of monitoring and maintenance activities. Once operational, the Project owner shall update and maintain the DESC for

the life of the Project and shall provide in the annual compliance report information on the results of monitoring and maintenance activities.

A separate DESCP shall be submitted for the Later Works area no later than thirty (30) days prior to the start of Later Works grading (and no later than thirty (30) days prior to the start of construction of the gen-tie line (or a project owner and CPM mutually agreed upon alternative time frame).

Note: The first change is to make the plan consistent with the DCBO approved Civil-1 Verification timing change. The second change acknowledges that separate plans will be submitted for the Early Works Area, Late Works Area, and gen-tie line.